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CHUNGHWA PICTURE TUBES (MALAYSIA)
SDN. BHD.

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-CV-5944 SC
MDL No. 1917

This Document Relates To:

*ViewSonic Corporation v. Chunghwa Picture
Tubes, Ltd., et al.*, No. 3:14-cv-02510-SC

**DECLARATION OF RACHEL S. BRASS
IN SUPPORT OF DEFENDANTS
CHUNGHWA PICTURE TUBES, LTD.
AND CHUNGHWA PICTURE TUBES
(MALAYSIA) SDN. BHD.'S MOTION FOR
PARTIAL SUMMARY JUDGMENT FOR
LACK OF STANDING AS TO
VIEWSONIC CORPORATION**

Date: February 6, 2015
Time: 10:00 a.m.
Judge: Hon. Samuel Conti

1 I, Rachel S. Brass, hereby declare as follows:

2 1. I am a partner in the law firm of Gibson, Dunn & Crutcher LLP, counsel of record for
3 Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia) Sdn. Bhd. (collectively
4 “CPT”) in the above-referenced action brought by ViewSonic Corporation.

5 2. I submit this declaration in support of Defendants Chunghwa Picture Tubes, Ltd. and
6 Chunghwa Picture Tubes (Malaysia) Sdn. Bhd.’s Motion for Partial Summary Judgment for Lack of
7 Standing as to ViewSonic Corporation. Unless otherwise indicated, I have personal knowledge of the
8 foregoing and could and would testify to the same if called as a witness in this matter.

9 3. Attached as Exhibit A is a true and correct copy of excerpts from the Report of Alan
10 S. Frankel, Ph.D., dated June 6, 2014.

11 4. Attached as Exhibit B is a true and correct copy of Plaintiff ViewSonic Corporation’s
12 Responses and Objections to Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia)
13 Sdn. Bhd.’s First Set of Requests for Admission, served on October 13, 2014.

14 5. Attached as Exhibit C is a true and correct copy of Plaintiff ViewSonic Corporation’s
15 Responses and Objections to Chunghwa Picture Tubes, Ltd. and Chunghwa Picture Tubes (Malaysia)
16 Sdn. Bhd.’s First Set of Interrogatories, served on October 13, 2014.

17 6. Attached as Exhibit D are true and correct copies of the form submitted by Tatung
18 Company of America, Inc. (“TUS”) as a claimant on the settlement fund in *In re: TFT-LCD Direct*
19 *Purchaser Antitrust Litigation*, and the email submitting TUS’s claim to the direct purchaser
20 settlement fund, both dated April 4, 2012.

21 7. Attached as Exhibit E is a true and correct Plaintiff ViewSonic Corporation’s
22 Supplemental Responses and Objections to Chunghwa Picture Tubes, Ltd. and Chunghwa Picture
23 Tubes (Malaysia) Sdn. Bhd.’s Second Set of Interrogatories, served on November 4, 2014.

24 8. I have reviewed and am familiar with the deposition transcripts of all of CPT’s
25 witnesses in this litigation. In those depositions, no witness testified regarding any level of control by
26 CPT over Tatung Company.

1 I declare under penalty of perjury that the foregoing is true and correct. Executed this 14th
2 day of November 2014, at San Francisco, California.

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4 By: /s/ Rachel S. Brass
5 Rachel S. Brass

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